



BPS TELEPHONE COMPANY

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BERNIE, MO 63822-0550

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February 20, 2008

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FCC Mail Room

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street S. W., Suite TW-A325  
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2008  
EB Docket 06-36  
BPS Telephone Company

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2008 (DA 08-171), please find attached BPS Telephone Co. annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have any questions regarding this filing, please direct them to the undersigned at 573-293-2277 or email [winberry@bpstelephone.com](mailto:winberry@bpstelephone.com)

Sincerely,

Lisa Winberry  
General Manager  
BPS Telephone Co.

Cc: Enforcement Bureau, Telecommunications Consumers Division (2)  
Best Copy and Printing, Inc. (1)

Enclosures

No. of Copies rec'd 044  
List ABCDE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

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Annual 64.2009(e) CPNI Certification for 2007

Date filed: February 20, 2008

Name of company covered by this certification: BPS Telephone Co.  
Form 499 Filer ID: 812054

Name of signatory: Lisa Winberry

Title of signatory: General Manager, Secretary

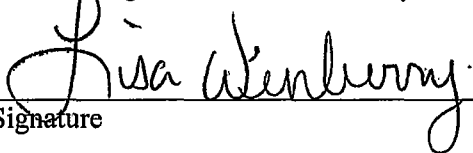
I, Lisa Winberry, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules, see Attachment A.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

I am making this statement for the year 2007.

  
Signature

Lisa Winberry  
Printed Name

Secretary  
Office Held

February 20, 2008  
Date

## **Attachment A**

### **Statement Concerning Procedures Ensuring Compliance with CPNI Rules**

The operating procedures of BPS Telephone Co. ensure that the Company complies with Part 64, section 2001 *et.seq.* of the FCC rules governing the use of CPNI.

The Company has established a system by which the status of a customer's approval for the use of CPNI can be clearly established prior to the use of CPNI. The Company relies on the involvement of its supervisor/management to ensure that no use of CPNI is made without review of applicable rules and law.

The Company trains its personnel regarding when they are authorized to use CPNI, as well as when they are not authorized to use CPNI. Personnel must sign a verification form stating they have completed training and understand that any infraction of the CPNI procedures can result in disciplinary action being taken against them.

The Company has an express disciplinary process in place for personnel who create or are involved in an infraction of the CPNI rules and the Company's CPNI Operating Procedures.

The Company maintains records of its own sales and marketing campaigns via a log. These records include a description of each campaign, the specific CPNI used in the campaign, and the products and services that were offered as a part of the campaign. The Company has a supervisory review process for all outbound marketing. The marketing campaign log requires a supervisor to review, sign and date the log. These records are maintained for a minimum of one year.

The Company maintains records of customer approval for the use of CPNI that include a copy of the notice and the customer's "opt-out" written notification. These records are maintained for a minimum of one year.

The Company requires that customers be authenticated at the beginning of all customer initiated calls, online transactions, or in-store visit. In store visits require a valid photo ID.

The Company maintains a log of unauthorized use of CPNI, where law enforcement is required to be notified. This includes the date of discovery, notification to law enforcement, description of the breach, circumstances of the breach and a supervisor's signature and date. This log is maintained for a minimum of two years.



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February 20, 2008

Marlene H. Dortch, Secretary  
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Federal Communications Commission  
445 12th Street S. W., Suite TW-A325  
Washington, D.C. 20554

RE: Certification of CPNI Filing, March 1, 2008  
EB Docket 06-36  
FDF Communications Co. dba BPS Long Distance

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2008 (DA 08-171), please find attached FDF Communications Co. dba BPS Long Distance annual compliance certificate for the most recent period, as required by section 64.2009(e) of the Commission's Rules, together with a statement of how its operating procedures ensure that it is or is not in compliance with the rules (Attachment A), an explanation of actions taken against data brokers, and a summary of customer complaints received in the past year concerning the unauthorized release of Customer Proprietary Network Information (CPNI).

Should you have any questions regarding this filing, please direct them to the undersigned at 573-293-2277 or email [winberry@bpstelephone.com](mailto:winberry@bpstelephone.com)

Sincerely,

A handwritten signature in cursive script, reading "Lisa Winberry", is written over a horizontal line.

Lisa Winberry  
General Manager  
FDF Communications Co. dba BPS Long

Distance

Cc: Enforcement Bureau, Telecommunications Consumers Division (2)  
Best Copy and Printing, Inc. (1)

Enclosures